

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

In re Application of financialright claims  
GmbH

C.A. No. 23-1481-CFC

For an Order Pursuant to 28 U.S.C.  
§ 1782 to Conduct Discovery for Use in  
a Foreign Proceeding

**MOTION TO COMPEL ARBITRATION AND TO STAY FURTHER  
PROCEEDINGS PENDING ARBITRATION**

Respondents Burford German Funding LLC, German Litigation Solutions LLC, and Burford Capital LLC (collectively, “Movants”) hereby move this Honorable Court for an Order in the form submitted herewith, compelling arbitration of Petitioner financialright claims GmbH’s application for discovery under 28 U.S.C. § 1782, and staying any further court proceedings on that application.

The bases for this motion are set forth in the accompanying Memorandum of Law and Exhibit thereto in support of this motion.

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Dated: May 31, 2024

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*/s/ Anne Shea Gaza*

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**[PROPOSED] ORDER**

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2024, that  
Respondents Burford German Funding LLC, German Litigation Solutions LLC,  
and Burford Capital LLC's Motion to Compel Arbitration and to Stay Further  
Proceedings Pending Arbitration is GRANTED and that Petitioner financialright  
claims GmbH's § 1782 application is stayed pending arbitration.

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Honorable Colm F. Connolly  
Chief Judge, United States District  
Court

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**LOCAL RULE 7.1.1 CERTIFICATION**

Counsel for Respondents Burford German Funding LLC, German Litigation Solutions LLC, and Burford Capital LLC (collectively, “Movants”) certifies that a reasonable effort was made to reach agreement with Petitioner financialright claims GmbH regarding the matters set forth in Movants’ Motion to Compel Arbitration and the Stay Further Proceedings Pending Arbitration, including oral communication involving Delaware counsel for all parties, but no agreement was reached.

Dated: May 31, 2024

**YOUNG CONAWAY STARGATT  
& TAYLOR, LLP**

/s/ Anne Shea Gaza

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on May 31, 2024, a copy of the foregoing document was served on the counsel listed below in the manner indicated:

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